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**BEFORE THE TENNESSEE REGULATORY AUTHORITY  
NASHVILLE, TENNESSEE**

Re: *Petition of UNE-P Coalition to Open* )  
*Contested Case Proceeding to Declare* )  
*Unbundled Switching an Unrestricted* )  
*Unbundled Network Element* )

OFFICE OF THE  
EXECUTIVE SECRETARY  
**Docket No. 02-00207**

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**UNE-P COALITION FIRST DATA REQUEST TO  
BELLSOUTH TELECOMMUNICATIONS, INC.**

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The UNE-P Coalition serves upon BellSouth Telecommunications, Inc. ("BellSouth") the following written interrogatories to be answered under oath by an officer or agent of BellSouth on or before June 13, 2002.

**INSTRUCTIONS FOR USE AND DEFINITIONS**

1. All information is to be divulged which is in the possession of BellSouth, its attorneys, investigators, agents, employees, or other representatives of BellSouth and/or its attorneys.
2. Where an Interrogatory calls for an answer that involves more than one part, each part of the answer should be clearly set out so it is understandable.
3. In the event the space provided on the form of Interrogatories is not sufficient for your answer to any of the Interrogatories, please attach a labeled, separate sheet of paper with the additional information.
4. These Interrogatories are intended as continuing Interrogatories, requiring you to supplement your answer, setting forth any information within the scope of the Interrogatories that may be acquired by you, your agents, your attorneys, or representatives at any time following the date of your original answer.

5. "State all facts" or "state the factual basis" means to set forth in writing and in detail every fact, opinion, assumption, belief, hypothesis, and theory, concerning or relating to the matter inquired about in the Interrogatory, whether these are matters of your own observation and actual knowledge, or are matters which you have become aware of through some other means or through some other person. It furthermore means to set forth in writing in detail how and when you came to observe or have actual knowledge of the matter and how and when you became aware of the matter through some other means or person. It also means to identify all such persons through whom you became aware of the matters.
6. When used with reference to natural persons, the word "identify" or "identity" or the phrase "give the identity of" means to state his or her full name, present or last-known address, present or last-known employer, present or last-known telephone number, occupation or profession, and the capacity in which he or she has ever been affiliated with BellSouth.
7. When used with reference to a document, the word "identify" or "identity" or the phrase "give the identity of" means to state the type of document to which the Interrogatory is addressed (i.e., correspondence, memoranda, notes, etc.); its title or other means of identification; its author's identity; its date; the identity of all recipients of the document (whether the document is addressed to such recipient or merely copied to such recipient); all dates and places of recording or filing with any court, commission, or public agency; the book and page number, or cause number, and all other information reflecting recordation or filing; the present location and identity of the custodian of the original document; the present location and identity of all the persons having a copy of such document; and whether such original or copy of the document is presently in your possession or control, and, if it is not,

what disposition was made of it. In the alternative, the document(s) in question may be attached to the answer to that particular Interrogatory.

8. "Documents" is to be construed in the broadest possible sense and means any tangible thing, recording and reproduction, whether visual, auditory or digital in BellSouth's possession, control, or custody, including without limiting the generality of its meaning, correspondence, pleadings, reports, depositions, personal memoranda, memoranda to files, inter-office memoranda, intra-office memoranda, drawings, prints, graphs, charts, photographs, phonographs, notes, studies, valuations, analyses, reports (whether expert or otherwise), reviews, working papers, books, notes, telegrams, pamphlets, video or audio tapes, voice recordings, computer tapes, printouts or cards, microfilms, microfiches, and any papers or items on which words have been written, printed, typed, or otherwise affixed, and shall mean a copy when the original is not in the possession, control, or custody of BellSouth, and shall mean every copy of every document when such a copy is not an identical copy of an original.
9. "Person" shall mean and is defined as any natural person, proprietorship, association, partnership, corporation or any business entity, to include in the singular as well as the plural.
10. "You" or "yours" means BellSouth and any agents or employees thereof.
11. An objection of attorney-client privilege or work-product in response to an Interrogatory or Document Request is not an excuse for a complete failure to respond. If you have such an objection, you are instructed to state fully the grounds for such objections, specifying, in the case of attorney-client privilege: (1) what type of communication is involved (letter, oral communication, memorandum, etc.), (2) the identities of all persons who are or were ever privy to the contents of such communications, (3) the general subject matter of the

communication, (4) the date of and place where the communication was made, and (5) the general nature of the subject matter of the legal advice that was being sought or rendered, during the course of which such communication took place; and in the case of work-product privilege: (1) the identity of the attorney or person acting at the request or counsel who developed the work-product, (2) what the form of the work product is (letter, memorandum, etc.), (3) the identity of all persons who ever have been privy to the contents of such work-product, (4) the date it was prepared, (5) what litigation it was prepared in anticipation of, and (6) the basis for your contention that it was "prepared in anticipation of litigation." Where such a privilege is asserted as to any document, you are instructed to prepare and submit to this defendant a list of all such documents together with the information supporting the claim of privilege and the identity of all such documents should be included as a part of your response to the requests for production of documents.

### REQUESTS FOR INFORMATION

- 1.a. Please provide, in electronic spreadsheet form, for the most recent month for which data is available, a listing of each central office in Tennessee identified by CLLI Code and name, indicating for each central office:
  - i. The number of unbundled local loops without switching provided to requesting carriers;
  - ii. The number of unbundled loops with switching (i.e. UNE-P lines) provided to requesting carriers;
  - iii. The number of customer lines provided to requesting carriers through resale;
  - iv.
- 1.b. Please provide the same information requested in Request 1.a. above, in the same format, for the month one year prior to the month for which data was provided in response to Request 1.a.
2. Please identify each central office (by switch CLLI Code and name) that is subject to the FCC's existing restriction on local switching (i.e., Zone 1 offices in the Top 50 MSAs) in Tennessee.

3.a. Provide, for the most recent period available, a distribution of BellSouth business customers in Tennessee in the following format:

Number of Lines	Customers	Customer Locations
3 or fewer lines		
4 lines		
5 lines		
6 lines		
7 lines		
8 lines		
9 lines		
10 lines		
11 lines		
12 lines		
13 lines		
14 lines		
15 lines		
16 lines		
17 lines		
18 lines		
19 lines		
20 lines		
21 lines		
22 lines		
23 lines		
24 lines		
25 or more lines		

3.b. Please provide the same information requested in Request 3.a., in the same format, but for customers served by the central offices identified in response to Request 2 (i.e. for customers in access density zone 1 of the Nashville MSA).

3.c. Please provide the same information requested in Request 3.a., in the same format, but disaggregated by CLLI Code.

4. Please provide, for each year since 1996, and quarterly since January 1, 1999, the following statistics in Tennessee:

a. The number of minutes that BellSouth terminated for CLECs (i.e., interconnection minutes that originated on CLEC switches and terminated with BellSouth customers);

- b. The number of minutes that CLECs terminated for BellSouth (i.e., interconnection minutes that originate with BellSouth customers and terminated on the CLEC network);
5. Provide all documents used to obtain management approval for the "BellSouth Connect and Grow Promotion" (i.e., BellSouth's promotion that required the customer to upgrade to a four-line package).
6. Provide all documents used to train sales and/or marketing personnel, including sales scripts, that describe or address the "BellSouth Connect and Grow Promotion."
7. Identify all terms, conditions, discounts and prices that comprised the "BellSouth Connect and Grow Promotion."
8. Please supply all tariff references (and copies of relevant tariff pages) that described the "BellSouth Connect and Grow Promotion." If this promotion was not tariffed, why was it not a tariffed offering?
9. With respect to the "BellSouth Connect and Grow Promotion" in Tennessee:
  - a. When was the BellSouth Connect and Grow Promotion offered in Tennessee?
  - b. How many customers subscribed to the BellSouth Connect and Grow Promotion in Tennessee?
  - c. Does BellSouth still offer the BellSouth Connect and Grow Promotion in Tennessee?
10. Identify each of the CLEC switches in the Nashville MSA that BellSouth believes to be in operation.
11. Please provide copies of all documents prepared by BellSouth related to hot cuts and loop provisioning, including without limitation time-and-motion studies and similar analyses.
12. How much time does BellSouth assume, for planning and workload management purposes, it will take a technician to complete a "hot-cut" for a single analog line customer? If a customer has multiple lines, how is the time to complete the hot-cut estimated?
13. How many BellSouth employees in Tennessee are trained to perform "hot-cuts"?
14. In 2001, what was BellSouth's churn rate in Tennessee for (1) residential customers, (2) single-line business customers, and (3) businesses customers with between two and 24 voice lines, inclusive.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'H. Walker', written over a horizontal line.

Henry Walker  
Boult, Cummings, Conners & Berry, PLC  
414 Union Street, Suite 1600  
Nashville, Tennessee 37219  
(615) 252-2363

Counsel for the UNE-P Coalition

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing has been forwarded via U.S. Mail, postage prepaid, to the following on this the 24<sup>th</sup> day of May, 2002.

Guy Hicks, Esq.  
BellSouth Telecommunications, Inc.  
333 Commerce St., Suite 2101  
Nashville, TN 37201-3300

Charles B. Welch, Esq.  
Farris, Mathews, et al.  
618 Church Street  
Suite 300  
Nashville, TN 37219

  
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Henry Walker